

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to:

Motor Vehicle Software Corp. v. CDK Global, LLC, Hon. Amy J. St. Eve
et al., Case No. 1:18-cv-00865 (N.D. Ill.)

**MOTOR VEHICLE SOFTWARE CORPORATION’S MOTION TO SEAL
ITS SUPPLEMENT TO ITS OPPOSITION AND ACCOMPANYING EXHIBITS
TO DEFENDANTS’ SECOND MOTIONS TO DISMISS**

Plaintiff, Motor Vehicle Software Corporation (“MVSC”), respectfully requests leave to file under seal its Supplement to Its Opposition to Defendants’ Second Motions to Dismiss (“Supplement”). The Supplement and Exhibits include information from documents that Defendants have designated as “Highly Confidential,” and so MVSC must seek leave to file them under seal. MVSC will also file a public, redacted version of the Supplement.

MVSC files this motion without prejudice to its ability to file a motion challenging CDK’s designations. The documents at issue consist of run-of-the-mill email communications and business presentations that contain no trade secrets or proprietary information. There is nothing Highly Confidential about such communications and documents. Should the parties be unable to resolve their disagreement about CDK’s use of the Highly Confidential designation, MVSC reserves the right to move for relief from this Court.

Dated: April 20, 2018

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on April 20, 2018, I caused a true and correct copy of the foregoing **MOTOR VEHICLE SOFTWARE CORPORATION'S MOTION TO SEAL ITS SUPPLEMENT TO ITS OPPOSITION AND ACCOMPANYING EXHIBITS TO DEFENDANTS' SECOND MOTIONS TO DISMISS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.



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